

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
	:	
-vs-	:	<b>No. 3:23-CR-127</b>
	:	
<b>THOMAS TROTTA,</b>	:	<b>(Judge Mannion)</b>
	:	
<b>Defendant</b>	:	

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**REPORT OF MEDICAL ASSESSMENT OF THE DEFENDANT**

AND NOW comes the Defendant, Thomas Trotta, by and through his attorney Joseph R. D'Andrea, Esq., hereby provides this Honorable Court with medical documentation regarding the assessment and prognosis of the Defendant's medical issues and avers as follows:

1. On May 22, 2023, the United States Attorney for the Middle District of Pennsylvania filed a felony Information, charging Defendant Thomas TROTTA with one violation of 18 U.S.C. §§668 and 2, Theft of Major Artwork, Aid and Abet;
2. The Defendant plead guilty before the Honorable Malachy Mannion on July 5, 2023;

3. The Defendant was required to self-surrender on May 31, 2024; however, due to certain serious medical issues, the self-surrender has been extended;

4. By Order of the Court, dated May 31, 2024, the Defendant was required to inform the Court of his medical status;

5. Please find as Exhibit 1, a letter from Dr. Joshua Wilbur;

6. Dr. Wilbur's letter details the extent of Mr. Trotta's infection, including surgical proceedings, followed by intravenous antibiotics;

7. Dr. Wilbur believes that Mr. Trotta needs close medical attention and additional wound care until the laceration is without infection and healed;

8. Dr. Wilbur has scheduled Mr. Trotta for a follow up assessment on June 12, 2024;

9. Please find attached, marked as Exhibit 2, a recent progress note from Dr. Michael Moore;

10. The last entry by Dr. Moore makes it clear that placing Mr. Trotta in prison would be unhealthy and may lead to further complications;

11. Please find attached, marked as Exhibit 3, a photograph presently representing the open wound in the Defendant's leg;

12. The Defendant presently is suffering from a major laceration, which has become infected;

13. The Defendant's doctors believe that incarceration of the Defendant would be against his best medical interest;

14. It is respectfully requested that the Court allow the Defendant proper medical treatment, as his doctors have suggested and allow him not to surrender until his medical condition greatly improves;

WHEREFORE, it is respectfully requested that the Court allow the Defendant proper medical treatment, as his doctors have suggested and allow him not to surrender until his medical condition greatly improves and provide the Court with a medical update in 14 days

Respectfully submitted,

Date: June 7, 2024

/s/ Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, Esq  
Attorney for Thomas Trotta

LVPG ORTHOPEDICS AND SPORTS MEDICINE - MONTROSE  
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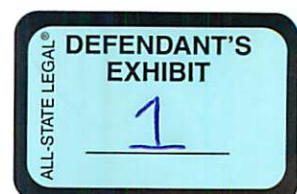
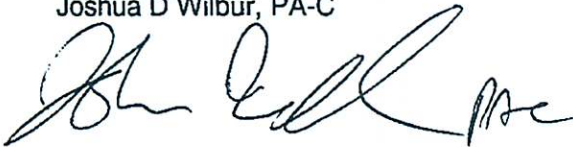
June 6, 2024

RE: Thomas Trotta  
DOB: 6/6/1975

To Whom it May Concern:

Thomas Trotta is currently under my care. He requires frequent wound care supervision. Is being treated by wound care three times weekly. He has had a persistent left lower extremity infection with subsequent three incision and drainage procedures in the operating room. These interventions have been followed by intravenous antibiotics and close monitoring via wound care. In addition, a wound vac has been required to facilitate healing. It is medically necessary that he is to be seen/follow up post operatively for the care of his wound until healed. Therefore, being in prison would be detrimental to his health. Will reassess on his next appointment on June 12, 2024.

Joshua D Wilbur, PA-C



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TROTТА, THOMAS(704418)



Wound Care and  
Hyperbaric Medicine

### Progress Note Details

<b>Patient Name:</b>	TROTТА, THOMAS	<b>Date:</b>	06/04/2024
<b>Patient Number:</b>	704418	<b>RN/LPN:</b>	Colladay, Rhonda RN
<b>Patient Date of Birth:</b>	06/06/1975	<b>Physician / Extender:</b>	Moore, Michael MD
<b>Patient Account Number:</b>	3637539		

### Subjective

#### Chief Complaint

This information was obtained from the Patient.

Skin was pricked by a nail in April, developed an abscess, has had 3 surgeries for drainage purposes. Has had wound VAC for 2 weeks.

#### Allergies

none

#### HPI

This information was obtained from the Patient.

**The following HPI elements were documented for the patient's wound:**

Location: left thigh

Quality: like a knife

Severity: 3-5

Duration: April 2024

Timing: intermittent

Modifying Factors: increased pain with ambulation and stairs

#### Family History

This information was obtained from the Patient.

Non-contributory- Mother, Father, Sibling

#### Social History

This information was obtained from the Patient.

Never smoker

Marital Status: married

Occupation: warehouse

Children

No Signs/Symptoms of Abuse

Suicide Risk: Patient denies suicidal ideation

Independent



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TROTТА, THOMAS(704418)

**Medical History**

This information was obtained from the Patient.

**Surgical History**

This information was obtained from the Patient.

**Patient has a surgical history of:**

3 I and D- (2024)

**Review of Systems (ROS)**

This information was obtained from the Patient.

**Complaints and Symptoms**

***Patient denies complaints or symptoms related to:***

Constitutional Symptoms (General Health)

Allergic/Immunologic

Ear/Nose/Mouth/Throat

Eyes

Endocrine

Respiratory

Hematologic/Lymphatic

Oncologic

Gastrointestinal (GI)

Genitourinary (GU)

Neurological

Psychiatric

General Notes

General Notes

Wore a holter monitor in April, no changes to meds or lifestyle since, 3 surgeries on thigh.

The patient is a wound care center at this time for further evaluation of the wound on the anterior surfaces of his left thigh. According to the patient's he was injured at work when a nail titrated his anterior surface of the left thigh. Subsequently Ellefson infection which required an drainage on 2 separate occasions and series of couple antibiotics. He now comes in for further further evaluation and treatment.

Past medical history is unremarkable review of symptoms is negative for any chills fever social history reveals the fact that he neither smokes or drinks at this time

**Objective**

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**Vitals**

Height/Length: 69 in (175.26 cm), Weight: 210 lbs (95.45 kgs), BMI: 31, Temperature: 98.7 °F (37.06 °C), Pulse: 92 bpm, Respiratory Rate: 18 breaths/min, Blood Pressure: 144/99 mmHg.

**Wound Assessment(s)**

Wound #1 Left, Anterior Thigh is a Full Thickness Surgical Wound and has received a status of Not Healed. Initial wound encounter measurements are 4.2cm length x 1.8cm width x 3 cm depth, with an area of 5.938 sq cm and a volume of 17.813 cubic cm. Muscle and adipose are exposed. There is a Moderate amount of yellow drainage noted which has no odor. The patient

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TROTТА, THOMAS(704418)

reports a wound pain of level 5/10. The wound margin is well defined Wound bed has 76-100%, bright red, granulation, 1-25% slough.

The periwound skin texture is normal. The periwound skin moisture is normal. The periwound skin color is normal.

Examination at this time reveals open wound on the anterior surface of his thigh there is mild tenderness but there is no sniffing and inflammation is or any fluctuance or crepitanсe that can be detected wound extends down to the fascia there is significant undermining the lateral aspect of the wound

Good sensation to the surrounding area as well.

## **Assessment**

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Assessment at this time is a traumatic puncture wound which subsequently became infected requiring surgical intervention.

## **Procedures**

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### **Wound #1**

Wound #1 (Surgical Wound) is located on the left, anterior thigh. A skin/subcutaneous tissue/muscle/fascia level surgical debridement with a total area debrided of 9 sq cm. was performed by Moore, Michael F., MD. Dermis, epidermis, fascia and subcutaneous were removed along with devitalized tissue: biofilm, fibrin, necrotic/eschar and slough. The following instrument(s) were used: curette. Pain control was achieved using Topical 2% Lidocaine . A time out was conducted prior to the start of the procedure. A minimal amount of bleeding was controlled with pressure. The procedure was tolerated well with a pain level of 1 throughout and a pain level of 0 following the procedure. Post Debridement Measurements: 4.5cm length x 2cm width x 3cm depth; with an area of 9 sq cm and a volume of 27 cubic cm.

#### General Notes

Debridement of viable and nonviable tissue to the bleeding edges were performed

The patient tolerated the debridement without incident

## **Plan**

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### **Wound Orders:**

#### **Wound #1 Left, Anterior Thigh**

##### Wound Cleansing & Dressings

Cleanse wound/affected area with normal saline or wound cleanser.

Aquacel Ag/Optical AG: extremity - ...Tuck part of Aquacel to 3 cm depth in center of wound

Change dressing every 2-3 days

#### Additional Orders:

##### Anesthetic

Topical Xylocaine to wound bed prior to debridement

##### Hand Hygiene

Hand Hygiene

##### Nutrition/Lifestyle/Additional Orders

Increase dietary Protein/ Decrease fat

##### Home Health

VNA HH - Lackawanna Co and surrounding areas - ..NEW ADMISSION

##### Follow-Up Appointments

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Return Appointment in 1 week.

- OTHER: - ..Pt at High Risk for infection and wound deterioration; anticipate at least 6-8 weeks for healing

The plan at this time is to initiate an interactive dressing change. Have the patient return in 1 week's time for further evaluation for the possible use of a VAC will be undertaken. It should be noted that the patient is a hearing for possible incarceration that is felt at this time that the action would put the patient in a prison environment would be an unhealthy and may lead to further complications

**Electronic Signature(s)****Signed By:**

Moore , Michael MD

**Date:**

06/05/2024 12:55:58 PM (ET)

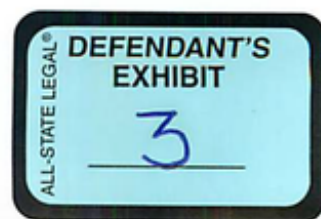
**6/4/2024 11:05:26 AM Version Electronically Signed By: Date:**

Moore , Michael MD

06/04/2024 12:22:26 PM (ET)

**Entered By: Moore , Michael MD on 06/05/2024 12:16:33 PM (ET)**





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MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>Defendant.</b>	:	

**CERTIFICATE OF SERVICE**

I, Joseph R. D'Andrea, do hereby certify that this document, the foregoing Motion, have been electronically serviced via e-mail, including the following:

James M. Buchanan, Esq.  
Assistant United States Attorney  
U.S. Attorney's Office, Middle District of Pennsylvania  
235 N. Washington Avenue, Suite 311  
Scranton, PA 18503  
James.Buchannan@usdoj.gov

And by placing the same in the United States mail, first class, postage prepaid, at Scranton, Pennsylvania, addressed to the following:

Thomas Trotta

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta

Date: June 7, 2024

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**CERTIFICATE OF NONCONCURRENCE**

I, Joseph R. D'Andrea, Counsel for the Defendant, contacted the Assistant United States Attorney, James Buchanan, to discuss the foregoing Motion wherein he indicated that the Government does not concur in the same at this time.

Date: June 7, 2024

Joseph R. D'Andrea  
JOSEPH R. D'ANDREA, ESQ.  
Attorney for Thomas Trotta